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June 9, 2020

VIA ECF

The Honorable Peggy Kuo
United States District Court, Courtroom 11C South
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Linksmart Wireless Technology, LLC v. Deep Blue Communications LLC*,
Case No. 1:18-cv-02441-EK-PK

Dear Judge Kuo:

We represent Plaintiff Linksmart Wireless Technology, LLC (“Linksmart”) in the above referenced action. Linksmart and Defendant Deep Blue Communications LLC (“Deep Blue”) filed a Joint Motion for Entry of Agreed Protective Order on May 6, 2020. Dkt. 57. The Court denied the Joint Motion and directed the parties to re-file the motion using the Court’s Proposed Confidentiality Order at <https://img.nyed.uscourts.gov/files/forms/FormConfidentialityOrder-PK.pdf>.

The parties have mutually conferred and agree that entry of a modified version of the Court’s form Confidentiality Order is appropriate in view of the technical nature of this case and the anticipated production of highly confidential material such as technical schematics and computer source code. The parties thus submit a new proposed confidentiality order in **Attachment A**. The new proposed proposed confidentiality order is based on Your Honor’s model confidentiality order, and includes redline changes to reflect revisions to the order that the parties have agreed are necessary in this case. Provisions such as these are common for patent infringement cases. Counsel for both parties are available to discuss any of the provisions with Your Honor. For the convenience of the Court, a “clean version” of this document, which accepts these redlined changes, is also

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submitted herewith as **Attachment B**.

In view of the foregoing, the parties jointly request that the proposed confidentiality order submitted herewith as **Attachment B** be adopted and entered by the Court. The parties would be pleased to provide the Court with any further information on this issue should the Court so require.

Sincerely,

DATED: June 9, 2020

/Benjamin T. Wang/

Benjamin T. Wang
Counsel for Plaintiff

DATED: June 9, 2020

/Krishnan Padmanabhan/

Krishnan Padmanabhan
Counsel for Defendant